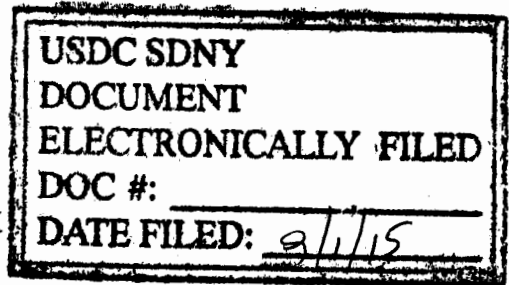


Stein, S.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK



JAMES T. GIESE,

Plaintiff,

v.

AMERICAN MEDICAL AND LIFE  
INSURANCE COMPANY,

Defendants.

Civil Action

14-cv-2816 (SHS)

CONSENT JUDGMENT

WHEREAS, this action was commenced on April 18, 2014, with the filing of a Complaint alleging that Defendant, American Medical and Life Insurance Company ("AMLI"), breached its employment agreement with Plaintiff, James T. Giese ("Plaintiff"). Plaintiff's Complaint sought approximately \$281,000 in damages;

WHEREAS, AMLI filed an Answer on or about June 19, 2014, denying the allegations set forth in the Complaint;

WHEREAS, the parties agree that this Court has jurisdiction over the parties and that venue is proper in this District;

WHEREAS, the parties wish to reach a consensual resolution of this matter, without the cost and uncertainty of further litigation;

WHEREAS, Plaintiff is willing to enter into this Consent Judgment based upon AMLI's representations and agreement to entry of this Consent Judgment; and

WHEREAS, AMLI agrees to entry of this Consent Judgment without otherwise admitting any allegation contained in the Complaint;

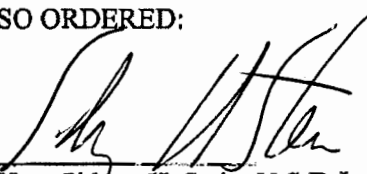
THEREFORE, Plaintiff and AMLI hereby stipulate and agree, and the Court Orders, that:

1. Judgment shall be entered in Plaintiff's favor against AMLI in the amount of \$160,000, inclusive of costs, interest and attorneys' fees; and

2. This Court shall retain jurisdiction to enforce, implement, or construe this Consent Judgment, and Plaintiff and AMLI consent to jurisdiction and venue in this Court for those purposes.

Dated: August 31, 2015

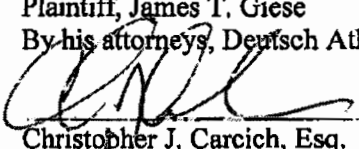
SO ORDERED:

  
Hon. Sidney H. Stein, U.S.D.J.

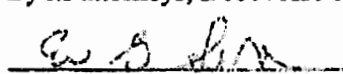
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Stipulated and Agreed:

Plaintiff, James T. Giese  
By his attorneys, Deutsch Atkins, P.C.

  
Christopher J. Carcich, Esq.  
Deutsch Atkins, P.C.  
25 Main Street, Suite 104  
Court Plaza North  
Hackensack, New Jersey 07601

Defendant, American Medical and Life Insurance Company  
By its attorneys, Debevoise & Plimpton LLP

  
Edwin G. Schallert, Esq.  
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New York, New York 10022